

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                            )  
                            )  
                            v.                      )                              Criminal No. 13-10164-WGY  
                            )  
                            )  
1. MICHAEL BOURQUE         )  
2. ROBERT HAGENAARS         )  
3. BRIAN CHISHOLM         )  
4. PHILLIP GOOLST         )  
5. TOMAS EHWA         )  
6. FRANK MCGUIRE         )  
7. MICHAEL ROY         )  
8. CHRISTOPHER YANCEY         )  
9. COREY ASSENCOA         )  
10. SEAN COTTER         )  
11. MARK NEWTON         )  
12. MARK OUELLETTE         )  
13. JOHN KINNEY         )  
14. RAYMOND PANAGGIO         )  
15. DAVID AKASA         )  
                            Defendants.         )

**UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On May 30, 2013, a federal grand jury sitting in the District of Massachusetts returned a one-count Indictment charging defendants,

1. Michael Bourque,
2. Robert Hagenaars,
3. Brian Chisholm,
4. Phillip Goolst,
5. Tomas Ehwa,
6. Frank McGuire,
7. Michael Roy,
8. Christopher Yancey,

9. Corey Assencoa,
10. Sean Cotter,
11. Mark Newton,
12. Mark Ouellette,
13. John Kinney,
14. Raymond Panaggio, and
15. David Akasa,

(the "Defendants") with Conspiracy to Possess With Intent to Distribute and to Distribute Oxycodone, in violation of 21 U.S.C. § 846 (Count One). The Indictment also contained a Forfeiture Allegation, which gave the Defendants notice that the United States sought forfeiture, jointly and severally, pursuant to 21 U.S.C. § 853, upon conviction of the offense alleged in Count One of the Indictment, of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

Pursuant to, and without limiting in any manner the Forfeiture Allegation of the Indictment, the United States hereby gives notice that it is seeking forfeiture of, without limitation, the following specific properties:

1. One gray 2005 Ford F-150, bearing Vehicle Identification Number 1FTPX14595FA24324 and Massachusetts Registration 634SG3.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Doreen M. Rachal  
MICHAEL I. YOON  
DOREEN M. RACHAL  
Assistant United States Attorneys  
U.S. Attorney's Office  
1 Courthouse Way, Suite 9200  
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(617) 748-3100

Dated: January 17, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

*/s/ Doreen M. Rachal*

DOREEN M. RACHAL

Assistant U.S. Attorney

Dated: January 17, 2014